UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE

JESUS R. SANCHEZ, on behalf of himself and all others similarly situated,

Plaintiff,

VS.

VERIFIED PERSON, INC., et al,

Defendants.

CASE NO. 2:11-cv-02548

DISTRICT JUDGE S. THOMAS ANDERSON

MAGISTRATE JUDGE CHARMIANE G. CLAXTON

PLAINTIFF'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND TO E-BACKGROUNDCHECKS.COM'S MOTION TO ELIMINATE CLASS ACTION ALLEGATIONS

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff, Jesus Sanchez, hereby moves the Court for an extension of time up to an including May 4, 2012 in which to respond to Defendant, e-BackgroundChecks.com's ("EBC") Motion to Eliminate Class Action Allegations Pursuant to Rule 23(D)(1)(d) (DN #43) ("Motion").

Plaintiff seeks additional time to provide a thorough and appropriate response to the Motion, and requires additional time to evaluate EBC's arguments. Accordingly, Plaintiff requests an additional eleven (11) days – up to and including May 4, 2012 – to respond to the Motion.

WHEREFORE, Plaintiff respectfully requests the entry of an Order extending his time up through and including May 4, 2012 to respond to EBC's Motion to Eliminate Class Action Allegations Pursuant to Rule 23(D)(1)(d). A proposed Order is submitted herewith as required by the Local Rules.

LOCAL RULE 7.2(a)(1)(B) CERTIFICATION

Undersigned counsel hereby certifies that he conferred with John Jett, counsel for EBC, via email and telephone on April 20, 2012 and is authorized to represent that EBC does not oppose the relief requested.

Respectfully submitted,

STUMPHAUZER, O'TOOLE, McLAUGHLIN, McGLAMERY & LOUGHMAN CO., LPA

By: /s/ Matthew A. Dooley

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Counsel for Jesus Sanchez and the putative class

CERTIFICATE OF SERVICE

I certify that on April 23, 2012, I electronically filed Plaintiff's Unopposed Motion for an Extension of Time to Respond to e-BackgroundChecks.com's Motion to Eliminate Class Action Allegations with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel and parties of record.

/s/ Matthew A. Dooley
Counsel for Jesus Sanchez and the putative class